UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JUL 10 2013

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jerry Osheka
Director, Environmental Compliance
PPG Industries, Inc.
440 College Park Drive
Monroeville, PA 15146

Re: Notice of Violation and Finding of Violation
PPG Industries, Inc., Barberton Plant
Barberton, Ohio

Dear Mr. Osheka:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation and Finding of Violation (NOV/FOV) to PPG Industries, Inc., (you) under Section 113(a)(1) and (a)(3) of the Clean Air Act, 42 U.S.C. § 7413(a)(1) and (a)(3). We find that you are violating the Ohio State Implementation Plan and your Title V permit at your Barberton, Ohio facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV/FOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Eleanor Kane. You may call her at (312) 353-4840 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

George T. Czerniak
Director
Air and Radiation Division

Enclosure

cc: Robert Hodanbosi, Chief, Division of Air Pollution Control, OEPA
Sam Rubens, Air Administrator, Akron Regional Air Quality Management District

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:	)	
	)	
PPG Industries, Inc.	)	**NOTICE OF VIOLATION and FINDING OF VIOLATION**
	)	
Barberton, Ohio	)	
	)	**EPA-5-13-OH-07**
Proceedings Pursuant to	)	
Section 113(a)(1) and (a)(3) of the	)	
Clean Air Act, 42 U.S.C.	)	
§ 7413(a)(1) and (a)(3)	)	
	)	

NOTICE OF VIOLATION

The U.S. Environmental Protection Agency (EPA) is issuing this Notice of Violation and Finding of Violation under Section 113(a)(1) and (a)(3) of the Clean Air Act (the Act), 42 U.S.C. § 7413(a)(1) and (a)(3). EPA finds that PPG Industries, Inc. (PPG) is violating the Ohio State Implementation Plan (SIP) and the Ohio Title V permit program, as follows:

Statutory and Regulatory Background

State Implementation Plan

1. Section 110(a)(1) of the Act, 42 U.S.C. § 7410(a)(1), requires each state to adopt and submit to the EPA for approval a SIP that provides for the implementation, maintenance, and enforcement of the National Ambient Air Quality Standards (NAAQS). Under Section 110(a) of the Act, 42 U.S.C. § 7410(a), each SIP must include a permit program to regulate the operation of any stationary source of air pollution as necessary to assure that NAAQS are achieved.

2. On March 23, 1995, EPA approved Ohio Administrative Code (OAC) 3745-21-10(C), with an effective date of May 22, 1995, as part of the federally enforceable SIP for the State of Ohio. 60 Fed. Reg. 15241. OAC 3745-21-10(C) specifies the method for the determination of Volatile Organic Compounds (VOC) concentration, VOC mass emission rate, and VOC control equipment efficiency.

3. The Ohio SIP at OAC 3745-21-10(C)(3)(a) provides, in pertinent part, that the source shall be operated at or near maximum operating capacity during any testing.

4. The Ohio SIP at OAC 3745-21-10(C)(3)(g) provides, in pertinent part, that for gas streams tested by EPA Method 25 or 25A, the VOC emission rate shall be based upon the average of three test runs.

5. Pursuant to 40 C.F.R. § 52.23, EPA may take an enforcement action under Section 113 of the Act, 42 U.S.C. § 7413, when a person fails to comply with any permit limitation or condition contained within a permit issued under a SIP-approved permit program.

6. Pursuant to Section 113(a) and (b) of the Act, 42 U.S.C. § 7413(a) and (b), upon EPA approval, SIP requirements are federally enforceable under Section 113.

Title V Permit Program

7. Title V of the Act, 42 U.S.C. §§ 7661-7661f, established an operating permit program for major sources of air pollution.

8. In accordance with Section 502(b) of the Act, 42 U.S.C. § 7661a(b), the EPA promulgated regulations establishing the minimum elements of a Title V permit program to be administered by any air pollution control agency. *See* 57 Fed. Reg. 32295 (July 21, 1992). Those regulations are codified at 40 C.F.R. Part 70.

9. Section 502(d) of the Act, 42 U.S.C. § 7661a(d), provides that each state must submit to the EPA a permit program meeting the requirements of Title V.

10. On August 15, 1995, EPA approved the State of Ohio operating permit program with an effective date of October 1, 1995. *See* 40 C.F.R. Part 70, Appendix A.

11. Section 502(a) of the Act, 42 U.S.C. § 7661a(a), and 40 C.F.R. § 70.7(b) provide that, after the effective date of any permit program approved or promulgated under Title V of the Act, no source subject to Title V may operate except in compliance with a Title V permit.

12. 40 C.F.R. § 70.6(b)(1) provides that that all terms and conditions in a Title V permit are enforceable by the EPA.

PPG's Barberton Facility

13. PPG owns and operates three plants at its campus located at 4829 Fairland Road, Barberton, Ohio.

14. The Teslin Plant is a manufacturing facility operating under Title V Permit Number P0106487 (Current Teslin Permit) issued by the Ohio Environmental Protection Agency (OEPA) on May 2, 2012. Prior to the issuance of the Current Teslin Permit, Teslin operated under a Title V permit issued on November 21, 2005 (2005 Teslin Permit). On September 27, 2007 OEPA issued Permit-to-Install Number 16-02500 for the construction of Teslin Line 4 (2007 Teslin PTI).

15. PPG most recently conducted compliance emission tests at Teslin Lines 2 and 3 (simultaneously) on June 23, 2010 and at Teslin Line 4 on December 2, 2009.

16. On April 29, 2011, PPG submitted a 2010 Title V Compliance Certification for the Teslin Plant to EPA. On April 25, 2012, PPG submitted a 2011 Title V Compliance Certification for the Teslin Plant to EPA.

17. The South Plant (also called the Optical Plant) is a chemical manufacturing facility currently operating under Title V Permit Number P0106489 (Current South Plant Permit) issued by the OEPA on August 17, 2012. Prior to the issuance of the Current South Plant Permit, the South Plant operated under a Title V permit issued on November 21, 2005 (2005 South Plant Permit).

18. On October 25, 27, and 28, 2004, PPG conducted a performance test at the South Plant thermal incinerator. The purpose of this testing was to determine compliance with the 90% destruction efficiency requirement for organic compounds (OCs) at the Chlorformates Plant stack.

19. On February 15, 2005, PPG conducted a performance test at the South Plant thermal incinerator. The purpose of this testing was to determine compliance with the 90% destruction efficiency requirement for OCs at the Chlorformates Plant stack.

20. On October 27, 2010, PPG conducted a performance test at the South Plant thermal incinerator. The purpose of this testing was to determine compliance with the emission limits.

Applicable Permit Terms and Conditions

Teslin Plant

21. Part-III.A.I.1 of the 2005 Teslin Permit limits fugitive organic compound (OC) emissions from the Teslin Line 2 (P110) to 191 pounds per day.

22. The testing requirements for Teslin Line 2 (P110) at C.1(f)(1)b.ix. of the Current Teslin Permit specify that when testing for compliance with the emission limitation of 90% reduction of OC emissions, if either Line 2, Line 3, or Line 4 is not operating and does not contain trichloroethylene (TCE) on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

23. The testing requirements for Teslin Line 2 (P110) at C.1(f)(1)c.vii. of the Current Teslin Permit specify that when testing for compliance with the emission limitation of 191 pounds per day of fugitive OC emissions, if either Line 2, Line 3, or Line 4 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

24. The testing requirements for Teslin Line 3 and Line 4 (P114 and P115) at C.2(f)(1)d.vii. of the Current Teslin Permit specify that when testing for compliance with the combined stack and fugitive TCE/OC emission limitation of 9.0 pounds per hour, if either Line 2, Line 3, or Line 4 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

25. The testing requirements for Teslin Line 3 and Line 4 (P114 and P115) at C.2(f)(1)e.vii. of the Current Teslin Permit specify that when testing for compliance with the combined stack and fugitive TCE/OC emission limitation of 39.4 tons per year, if either Line 2, Line 3, or Line 4 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

26. The testing requirements for Teslin Line 3 and Line 4 (P114 and P115) at C.2(f)(1)f.ix. of the Current Teslin Permit specify that when testing for compliance with the emission limitation of 90% reduction of TCE, if either Line 2, Line 3, or Line 4 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

27. The testing requirements for Teslin Line 4 (P115) at Part-III.A.V.1.c.ix. of the 2007 Teslin PTI specify that when testing for compliance with the emission limitation of 90% overall reduction of TCE, if either Line 2, Line 3 or Line 4 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

28. The testing requirements for Teslin Line 4 (P115) at Part-III.A.V.1.e.vii. of the 2007 Teslin PTI specify that when testing for compliance with the emission limitation of 39.4 tons per year of TCE/OC, if either Line 2, Line 3 or Line 4 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

29. The testing requirements for Teslin Line 4 (P115) at Part-III.A.V.1.f.vii. of the 2007 Teslin PTI specify that when testing for compliance with the emission limitation of 9.0 pounds per hour of TCE/OC, if either Line 2, Line 3 or Line 4 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

30. The testing requirements for Teslin Line 2 (P110) at Part-III.A.V.1.c.8. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 90% overall reduction of OC, if either Line 2 or Line 3 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

31. The testing requirements for Teslin Line 3 (P114) at Part-III.A.V.1.c.viii. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 90% reduction of TCE, if either Line 2 or Line 3 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

32. The testing requirements for Teslin Line 3 (P114) at Part-III.A.V.1.e.vii. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 39.4 tons per year TCE/OC, if either Line 2 or Line 3 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

33. The testing requirements for Teslin Line 3 (P114) at Part-III.A.V.1.g.vii. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 9.0 pounds per hour TCE/OC, if either Line 2 or Line 3 is not operating and does not contain TCE on a given operating day, no fugitive emissions shall be allocated to that line for that operating day.

34. The testing requirements for Teslin Line 2 (P110) at C.1(f)(1)b.xii of the Current Teslin Permit specify that when testing for compliance with the emission limitation of 90% reduction of OC, the overall removal efficiency (RE) shall be calculated daily as follows:

$$RE(\%) = \frac{R_{\text{AVG DAILY}}}{R_{\text{AVG DAILY}} + \frac{E_{\text{TOT30}}}{30}} \times 100$$

35. The testing requirements for Teslin Line 3 and Line 4 (P114 and P115) at C.2 (f)(1)f.xii. of the Current Teslin Permit specify that when testing for compliance with the emission limitation of 90% reduction of TCE, the overall RE shall be calculated daily as follows:

$$RE(\%) = \frac{R_{\text{AVG DAILY}}}{R_{\text{AVG DAILY}} + \frac{E_{\text{TOT30}}}{30}} \times 100$$

36. The testing requirements for Teslin Line 4 (P115) at Part III.A.V.1.c.xii of the 2007 Teslin PTI specify that when testing for compliance with the emission limitation of 90% reduction of TCE, the overall RE shall be calculated daily as follows:

$$RE(\%) = \frac{R_{\text{AVG DAILY}}}{R_{\text{AVG DAILY}} + \frac{E_{\text{TOT30}}}{30}} \times 100$$

37. The testing requirements for Teslin Line 2 (P110) at Part-III.A.V.1.c.11. of the 2005 Teslin Permit, specify that when testing for compliance with the emission limitation of 90% reduction of OC, the overall RE shall be calculated daily as follows:

$$RE(\%) = \frac{R_{\text{AVG DAILY}}}{R_{\text{AVG DAILY}} + \frac{E_{\text{TOT30}}}{30}} \times 100$$

38. The testing requirements for Teslin Line 3 (P114) at Part-III.A.V.1.c.xi. of the 2005 Teslin Permit, specify that when testing for compliance with the emission limitation of 90% reduction of OC, the overall RE shall be calculated daily as follows:

$$RE(\%) = \frac{R_{\text{AVG DAILY}}}{R_{\text{AVG DAILY}} + \frac{E_{\text{TOT30}}}{30}} \times 100$$

39. The testing requirements for Teslin Line 2 (P110) at Part-III.A.V.1.c.3. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 90% reduction of OC, the total air emissions as a rolling 30-day summation (E_{TOT30}) shall be calculated daily using the current day emissions plus the previous 29 days.

40. The testing requirements for Teslin Line 2 (P110) at Part-III.A.V.1.c.4. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 90% reduction of OC, the point source emissions as a rolling 30-day summation (E_{ADS30}) shall be calculated daily using the current day emissions plus the previous 29 days.

41. The testing requirements for Teslin Line 2 (P110) at Part-III.A.V.1.c.9. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 90% reduction of OC, the TCE recovered from the carbon adsorber as a rolling 30-day summation (R_{30}) shall be calculated daily using the current day emissions plus the previous 29 days.

42. The testing requirements for Teslin Line 2 (P110) at Part-III.A.V.1.d.2. of the 2005 Teslin Permit specify that when testing for compliance with the stack emission limitation of 0.8 pounds per hour of OC and 3.5 tons per year of OC, the point source emissions as a rolling 30-day summation (E_{ADS30}) shall be calculated daily using the current day emissions plus the previous 29 days.

43. The testing requirements for Teslin Line 2 (P110) at Part-III.A.V.1.e.3. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 191 pounds per day and 33.8 tons per year of fugitive OC emissions, the total air emissions as a rolling 30-day rolling summation (E_{TOT30}) shall be calculated daily using the current day emissions plus the previous 29 days.

44. The testing requirements for Teslin Line 2 (P110) at Part-III.A.V.1.e.4. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 191 pounds per day and 33.8 tons per year of fugitive OC emissions, the point source emissions as a rolling 30-day summation (E_{ADS30}) shall be calculated daily using the current day emissions plus the previous 29 days.

45. The testing requirements for Teslin Line 3 (P114) at Part-III.A.V.1.c.iii. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 90% reduction of TCE, the total air emissions as a rolling 30-day rolling summation (E_{TOT30}) shall be calculated daily using the current day emissions plus the previous 29 days.

46. The testing requirements for Teslin Line 3 (P114) at Part-III.A.V.1.c.iv. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 90% reduction of TCE, the point source emissions as a rolling 30-day summation (E_{ADS30}) shall be calculated daily using the current day emissions plus the previous 29 days.

47. The testing requirements for Teslin Line 3 (P114) at Part-III.A.V.1.c.ix. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 90% reduction of TCE, the TCE recovered from the carbon adsorber as a rolling 30-day total (R_{30}) shall be calculated daily using the current day emissions plus the previous 29 days.

48. The testing requirements for Teslin Line 3 (P114) at Part-III.A.V.1.e.iii. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 39.4 tons per year TCE/OC, the total air emissions as a rolling 30-day summation (E_{TOT30}) shall be calculated daily using the current day emissions plus the previous 29 days.

49. The testing requirements for Teslin Line 3 (P114) at Part-III.A.V.1.e.iv. of the 2005 Teslin Permit specify that when testing for compliance with the emission limitation of 39.4 tons per year TCE/OC, the point source emissions as a rolling 30-day summation (E_{ADS30}) shall be calculated daily using the current day emissions plus the previous 29 days.

50. The testing requirements for Teslin Line 4 (P115) at Part-III.A.V.1.c.iii. of the 2007 Teslin PTI specify that when testing for compliance with the emission limitation of 90% reduction of TCE, the total air emissions as a rolling 30-day summation (E_{TOT30}) shall be calculated daily using the current day emissions plus the previous 29 days.

51. The testing requirements for Teslin Line 4 (P115) at Part-III.A.V.1.c.iv. of the 2007 Teslin PTI specify that when testing for compliance with the emission limitation of 90% reduction of TCE, the point source emissions as a rolling 30-day summation (E_{ADS30}) shall be calculated daily using the current day emissions plus the previous 29 days.

52. The testing requirements for Teslin Line 4 (P115) at Part-III.A.V.1.c.x. of the 2007 Teslin PTI specify that when testing for compliance with the emission limitation of 90% reduction of TCE, the TCE recovered from the carbon adsorber as a rolling 30-day total (R_{30}) shall be calculated daily using the current day emissions plus the previous 29 days.

53. The control requirements for Teslin Line 3 and Line 4 (P114 and P115) at C.2.(b)(2)e. of the Current Teslin Permit specify that the primary process enclosures, defined as the mixer, extractor, dryer and oven shall be totally enclosed such that all TCE/OC emissions are captured, contained, and directed to the carbon adsorption unit.

54. The control requirements for Teslin Line 3 and Line 4 (P114 and 115) at C.2.(b)(2)f. of the Current Teslin Permit specify that, among other things, the primary process enclosures shall meet all of the criteria at C.2.(b)(2)f.i. through v. if the capture efficiency of the enclosure and control device is to be assumed to be 100%. C.2.(b)(2)f.i. provides that any natural draft opening (NDO) shall be at least four equivalent opening diameters from each TCE/OC emitting point. If the opening is not circular the equivalent diameter (ED) must be calculated as follows:

$$ED = \left[\frac{4(area)}{\pi}\right]^{1/2}$$

55. The control requirements for Teslin Line 3 (P115) at Part III.A.II.2. of the 2005 Teslin Permit specify that the primary process enclosures, defined as the mixer, extractor, dryer and oven shall be totally enclosed such that all TCE/OC emissions are captured, contained, and directed to the carbon adsorption unit. Part III.A.II.2.a. further specifies that any NDO shall be at least four equivalent opening diameters from each TCE/OC emitting point.

56. The testing requirements for Teslin Line 2 (P110) at C.1(f)(1)a.i. of the Current Teslin Permit specify that, when testing for compliance with the OC emission limitation of 0.8 pounds per hour and 3.5 tons per year, annual emissions shall be calculated using daily point source emissions from the combined operations of Line 2, Line 3 and Line 4.

57. The testing requirements for Teslin Line 2 (P110) at C.1(f)(1)b.i. of the Current Teslin Permit specify that, when testing for compliance with the emission limitation of 90% reduction for OC, the overall control efficiency shall be calculated using daily point source emissions from the combined operations of Line 2, Line 3 and Line 4.

58. The testing requirements for Teslin Line 2 (P110) at C.1(f)(1)c.i. of the Current Teslin Permit specify that, when testing for compliance with the emission limitation of 191 pounds per day and 33.8 tons per year of fugitive OC emissions, compliance shall be demonstrated using daily point source emissions from the combined operations of Line 2, Line 3 and Line 4.

59. The testing requirements for Teslin Line 3 and Line 4 (P114 and P115) at C.2(f)(1)d.i. of the Current Teslin Permit specify that, when testing for compliance with the TCE/OC emission limitation of 9.0 pounds per hour, combined stack and fugitive emissions shall be calculated using daily point source emissions from the combined operations of Line 2, Line 3 and Line 4.

60. The testing requirements for Teslin Line 3 and Line 4 (P114 and P115) at C.2(f)(1)e.i. of the Current Teslin Permit specify that, when testing for compliance with the TCE/OC emission limitation of 39.4 tons per year, annual emissions shall be calculated using daily point source emissions from the combined operations of Line 2, Line 3 and Line 4.

61. The testing requirements for Teslin Line 3 and Line 4 (P114 and P115) at C.2(f)(1)f.i. of the Current Teslin Permit specify that, when testing for compliance with the emission limitation of 90% reduction of TCE, overall control efficiency shall be calculated using daily point source emissions from the combined operations of Line 2, Line 3 and Line 4.

62. The testing requirements for Teslin Line 4 (P115) at Part-III.A.V.1.c.i. of the 2007 Teslin PTI specify that, when testing for compliance with the emission limitation of 90% reduction for TCE, overall control efficiency shall be calculated using daily point source emissions from the combined operations of Line 2, Line 3 and Line 4.

63. The testing requirements for Teslin Line 4 (P115) at Part-III.A.V.1.e.i. of the 2007 Teslin PTI specify that, when testing for compliance with the emission limitation of 39.4 tons per year of TCE/OC, annual emissions shall be calculated using daily point source emissions from the combined operations of Line 2, Line 3 and Line 4.

64. The testing requirements for Teslin Line 4 (P115) at Part-III.A.V.1.f.i. of the 2007 Teslin PTI specify that, when testing for compliance with the emission limitation of 9.0 pounds per hour TCE/OC, combined stack and fugitive emissions shall be calculated using daily point source emissions from the combined operations of Line 2, Line 3 and Line 4.

65. The testing requirement for Teslin Line 4 (P115) at Part-III.A.V.2.a. of the 2007 Teslin PTI specifies that emission testing must be performed within three months of starting operations at Teslin Line 4.

66. The leak detection and repair (LDAR) requirements for Teslin Line 3 and Line 4 (P114 and P115) at C.2.(d)(5)(a) of the Current Teslin Permit require that any pump "in light liquid service" shall be monitored monthly.

67. The LDAR requirements for Teslin Line 3 and Line 4 (P114 and P115) at C.2.(d)(13) of the Current Teslin Permit require that any pump "in light liquid service" be checked by visual inspection each calendar week.

68. The compliance certification requirements at I.A.12.d. of the 2005 Teslin Permit require PPG to provide an annual compliance certification which identifies, among other things, each term or condition of the permit that is the basis of the certification and whether compliance was continuous or intermittent.

South Plant

69. The monitoring and recordkeeping requirements for the Chloroformate Plant (P098) at Part III.A.III.2.a. of the 2005 South Plant Permit specify that the permittee shall collect and record the following information for each day: all 3-hour blocks of time during which the average combustion temperature within the thermal incinerator, when both the emissions unit and control devices are in operation, was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emissions unit was in compliance.

70. The testing requirements for the Chloroformate Plant (P098) at Part III.A.V.I.a. of the 2005 South Plant Permit specify that compliance with the 90% destruction of organic compounds emission limit shall be demonstrated based upon the emission testing specified in section A.V.2.

71. The testing requirements for the Chloroformate Plant (P098) at Part III.A.V.2.a. of the 2005 South Plant Permit specify the emission testing shall be conducted approximately 2.5 years after permit issuance and within 6 months prior to permit expiration.

72. The testing requirements for the Chloroformate Plant (P098) at Part III. A.V.2.d. of the 2005 South Plant Permit specify that the control efficiency of the thermal incinerator (i.e.,

the percent reduction in mass emissions between the inlet and outlet of the control system) shall be determined in accordance with the test methods and procedures specified in OAC rule 3745-21-10. Inlet and outlet sampling shall be conducted simultaneously.

Alleged Violations

Teslin Plant

73. On the 16 days in 2010 and 2011 listed below, daily fugitive OC emissions from Teslin Line 2 (P110) exceeded 191 pounds per day in violation of the permit condition in Part-III.A.I.1. of the 2005 Teslin Permit. EPA calculated these emissions using the procedure outlined in Part-III.A.V.1.e. of the 2005 Teslin Permit.

Date	lb/day	Date	lb/day
3/30/2010	259	2/21/2011	293
9/5/2010	288	5/9/2011	200
9/7/2010	283	5/10/2011	201
10/16/2010	202	5/24/2011	222
10/17/2010	201	7/30/2011	192
10/18/2010	204	7/31/2011	193
10/19/2010	204	8/1/2011	194
2/6/2011	271	8/2/2011	206

74. On certain days between May 23, 2012 through October 31, 2012, PPG allocated fugitive emissions from the Teslin Plant across Teslin Line 2, Line 3 and Line 4 when testing for compliance with the emission limitation of 90% reduction of OC for Teslin Line 2 (P110), even though one or more lines were not operating, in violation of the testing requirements at C.1(f)(1)b.ix. of the Current Teslin Permit.

75. On certain days between May 23, 2012 through October 31, 2012, PPG allocated fugitive emissions from the Teslin plant across Teslin Line 2, Line 3 and Line 4 when testing for compliance with the emission limitation of 191 pounds per day of fugitive OC emissions for Teslin Line 2 (P110), even though one or more lines were not operating, in violation of the testing requirements at C.1(f)(1)c.vii. of the Current Teslin Permit.

76. On certain days between May 23, 2012 through October 31, 2012, PPG allocated fugitive emissions from the Teslin plant across Teslin Line 2, Line 3 and Line 4 when testing for compliance with the combined stack and fugitive TCE/OC emission limitation of 9.0 pounds per hour for Teslin Line 3 and Line 4 (P114 and P115), even though one or more lines were not operating, in violation of the testing requirements at C.2(f)(1)d.vii. of the Current Teslin Permit.

77. On certain days between May 23, 2012 through October 31, 2012, PPG allocated fugitive emissions from the Teslin plant across Teslin Line 2, Line 3 and Line 4 when testing for compliance with the combined stack and fugitive TCE/OC emission limitation of 39.4 tons per year for Teslin Line 3 and Line 4 (P114 and P115), even though one or more

lines were not operating, in violation of the testing requirements at C.2(f)(1)e.vii. of the Current Teslin Permit.

78. On certain days between May 23, 2012 through October 31, 2012, PPG allocated fugitive emissions from the Teslin plant across Teslin Line 2, Line 3 and Line 4 when testing for compliance with the emission limitation of 90% reduction of TCE for Teslin Line 3 and Line 4 (P114 and P115), even though one or more lines were not operating, in violation of the testing requirements at C.2(f)(1)f.ix. of the Current Teslin Permit.

79. On certain days between July 1, 2008 through May 22, 2012, PPG allocated fugitive emissions from the Teslin plant across Teslin Line 2, Line 3 and Line 4 when testing for compliance with the emission limitation of 90% overall reduction of TCE for Teslin Line 4 (P115), even though one or more lines were not operating, in violation of the testing requirements at Part-III.A.V.1.c.ix. of the 2007 Teslin PTI.

80. On certain days between July 1, 2008 through May 22, 2012, PPG allocated fugitive emissions from the Teslin plant across Teslin Line 2, Line 3 and Line 4 when testing for compliance with the emission limitation of 39.4 tons per year of TCE/OC for Teslin Line 4 (P115), even though one or more lines were not operating, in violation of the testing requirements at Part-III.A.V.1.e.vii. of the 2007 Teslin PTI.

81. On certain days between July 1, 2008 through May 22, 2012, PPG allocated fugitive emissions from the Teslin plant across Teslin Line 2, Line 3 and Line 4 when testing for compliance with the emission limitation of 9.0 pounds per hour of TCE/OC for Teslin Line 4 (P115), even though one or more lines were not operating, in violation of the testing requirements at Part-III.A.V.1.f.vii. of the 2007 Teslin PTI.

82. On certain days between July 1, 2008 through May 22, 2012, PPG allocated fugitive emissions from the Teslin plant across all existing Teslin Lines when testing for compliance with the emission limitation of 90% overall reduction of OC for Teslin Line 2 (P110), even though one or more lines were not operating, in violation of the testing requirements at Part-III.A.V.1.c.8. of the 2005 Teslin Permit.

83. On certain days between July 1, 2008 through May 22, 2012, PPG allocated fugitive emissions from the Teslin plant across all existing Teslin Lines when testing for compliance with the emission limitation of 90% reduction of TCE for Teslin Line 3 (P114), even though one or more lines were not operating, in violation of the testing requirements at Part-III.A.V.1.c.viii. of the 2005 Teslin Permit.

84. On certain days between July 1, 2008 through May 22, 2012, PPG allocated fugitive emissions from the Teslin plant across all existing Teslin Lines when testing for compliance with the emission limitation of 39.4 tons per year TCE/OC for Teslin Line 3 (P114), even though one or more lines were not operating, in violation of the testing requirements at Part-III.A.V.1.e.vii. of the 2005 Teslin Permit.

85. On certain days between July 1, 2008 through May 22, 2012, PPG allocated fugitive emissions from the Teslin plant across all existing Teslin Lines when testing for compliance with the emission limitation of 9.0 pounds per hour TCE/OC for Teslin

Line 3 (P114), even though one or more lines were not operating, in violation of the testing requirements at Part-III.A.V.1.g.vii. of the 2005 Teslin Permit.

86. On every day from May 23, 2012 through October 31, 2012, PPG calculated the RE for Teslin Line 2 (P110) using R_{30} (the total TCE recovered from the adsorber over the last 30 days) in place of the $R_{AVG\ DAILY}$ (the daily average amount of TCE recovered from the carbon adsorber) when testing for compliance with the emission limitation of 90% reduction of OC. As a result, all calculated RE values were shown to be 100% rather than reflecting the actual RE. This is a violation of the testing requirements at C.1.(f)(1)b.xii. of the Current Teslin Permit.

87. On every day from May 23, 2012 through October 31, 2012, PPG calculated the RE for Teslin Line 3 and Line 4 (P114 and P115) using R_{30} in place of the $R_{AVG\ DAILY}$ when testing for compliance with the emission limitation of 90% reduction of TCE. As a result, all calculated RE values were shown to be 100% rather than reflecting the actual RE. This is a violation of the testing requirements at C.2.(f)(1)f.xii. of the Current Teslin Permit.

88. On every day from at least July 1, 2008 through May 22, 2012, PPG calculated the RE for Teslin Line 4 (P115) using R_{30} in place of the $R_{AVG\ DAILY}$ when testing for compliance with the emission limitation of 90% reduction of TCE. As a result, all calculated RE values were shown to be 100% rather than reflecting the actual RE. This is a violation of the testing requirements at Part III.A.V.1.c.xii of the 2007 Teslin PTI.

89. On every day from at least July 1, 2008 through May 22, 2012, PPG calculated the RE for Teslin Line 2 (P110) using R_{30} in place of the $R_{AVG\ DAILY}$ when testing for compliance with the emission limitation of 90% reduction of OC. As a result, all calculated RE values were shown to be 100% rather than reflecting the actual RE. This is a violation of the testing requirements at Part-III.A.V.1.c.11. of the 2005 Teslin Permit.

90. On every day from at least July 1, 2008 through May 22, 2012, PPG calculated the RE for Teslin Line 3 (P114) using R_{30} in place of the $R_{AVG\ DAILY}$ when testing for compliance with the emission limitation of 90% reduction of OC. As a result, all calculated RE values were shown to be 100% rather than reflecting the actual RE. This is a violation of the testing requirements at Part-III.A.V.1.c.xi. of the 2005 Teslin Permit.

91. On every day from January 1, 2012 through January 29, 2012, PPG calculated the total emissions as a rolling 30-day summation (E_{TOT30}) using data from December 2010 when testing for compliance with emission limitation of 90% reduction of OC for Teslin Line 2 (P110). This is a violation of the testing requirements at Part-III.A.V.1.c.3. of the 2005 Teslin Permit which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

92. On every day from January 1, 2012 through January 29, 2012, PPG calculated the point source emissions as a rolling, 30-day summation (E_{ADS30}) using data from December 2010 when testing for compliance with the emission limitation of 90% reduction of OC for Teslin Line 2 (P110). This is a violation of the testing requirements at Part-

III.A.V.1.c.4. of the 2005 Teslin Permit which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

93. On every day from January 1, 2012 through January 29, 2012, PPG calculated the TCE recovered from the adsorber as a rolling 30-day total (R_{30}) using data from December 2010 when testing for compliance with the emission limitation of 90% reduction of OC for Teslin Line 2 (P110). This is a violation of the testing requirements at Part-III.A.V.1.c.9. of the 2005 Teslin Permit which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

94. On every day from January 1, 2012 through January 29, 2012, PPG calculated the point source emissions as a rolling, 30-day summation (E_{ADS30}) using data from December 2010 when testing for compliance with the emission limitation of 0.8 pounds per hour of OC and 3.5 tons per year of OC for Teslin Line 2 (P110). This is a violation of the testing requirements at Part-III.A.V.1.d.2. of the 2005 Teslin Permit which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

95. On every day from January 1, 2012 through January 29, 2012, PPG calculated the total emissions as a rolling 30-day summation (E_{TOT30}) using data from December 2010 when testing for compliance with the emission limitation of 191 pounds per day and 33.8 tons per year of fugitive OC emissions for Teslin Line 2 (P110). This is a violation of the testing requirements at Part-III.A.V.1.e.3. of the 2005 Teslin Permit which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

96. On every day from January 1, 2012 through January 29, 2012, PPG calculated the point source emissions as a rolling, 30-day summation (E_{ADS30}) using data from December 2010 when testing for compliance with the emission limitation of 191 pounds per day and 33.8 tons per year of fugitive OC emissions for Teslin Line 2 (P110). This is a violation of the testing requirements at Part-III.A.V.1.e.4. of the 2005 Teslin Permit which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

97. On every day from January 1, 2012 through January 29, 2012, PPG calculated the total emissions as a rolling 30-day summation (E_{TOT30}) using data from December 2010 when testing for compliance with the emission limitation of 90% reduction of TCE for Teslin Line 3 (P114). This is a violation of the testing requirements at Part-III.A.V.1.c.iii. of the 2005 Teslin Permit which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

98. On every day from January 1, 2012 through January 29, 2012, PPG calculated the point source emissions as a rolling, 30-day summation (E_{ADS30}) using data from December 2010 when testing for compliance with the emission limitation of 90% reduction of TCE for Teslin Line 3 (P114). This is a violation of the testing requirements at Part-III.A.V.1.c.iv. of the 2005 Teslin Permit which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

99. On every day from January 1, 2012 through January 29, 2012, PPG calculated the TCE recovered from the adsorber as a rolling 30-day total (R_{30}) using data from December 2010 when testing for compliance with the emission limitation of 90% reduction of TCE for Teslin Line 3 (P114). This is a violation of the testing requirements at Part-III.A.V.1.c.ix. of the 2005 Teslin Permit which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

100. On every day from January 1, 2012 through January 29, 2012, PPG calculated the total emissions as a rolling 30-day summation (E_{TOT30}) data from December 2010 when testing for compliance with the emission limitation of 39.4 tons per year of TCE/ OC emissions for Teslin Line 3 (P114). This is a violation of the testing requirements at Part-III.A.V.1.e.iii. of the 2005 Teslin Permit which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

101. On every day from January 1, 2012 through January 29, 2012, PPG calculated the point source emissions as a rolling, 30-day summation (E_{ADS30}) using data from December 2010 when testing for compliance with the emission limitation of 39.4 tons per year of TCE/ OC emissions for Teslin Line 3 (P114). This is a violation of the testing requirements at Part-III.A.V.1.e.iv. of the 2005 Teslin Permit which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

102. On every day from January 1, 2012 through January 29, 2012, PPG calculated the total emissions as a rolling 30-day summation (E_{TOT30}) using data from December 2010 when testing for compliance with the emission limitation of 90% reduction of TCE for Teslin Line 4 (P115). This is a violation of the testing requirements at Part-III.A.V.1.c.iii. of the 2007 Teslin PTI which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

103. On every day from January 1, 2012 through January 29, 2012, PPG calculated the point source emissions as a rolling, 30-day summation (E_{ADS30}) using data from December 2010 when testing for compliance with the emission limitation of 90% reduction of TCE for Teslin Line 4 (P115). This is a violation of the testing requirements at Part-III.A.V.1.c.iv. of the 2007 Teslin PTI which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

104. On every day from January 1, 2012 through January 29, 2012, PPG calculated the TCE recovered from the adsorber as a rolling 30-day total (R_{30}) using data from December 2010 when testing for compliance with the emission limitation of 90% reduction of TCE for Teslin Line 4 (P115). This is a violation of the testing requirements at Part-III.A.V.1.c.x. of the 2007 Teslin PTI which specify that a rolling 30-day summation shall be calculated daily using the current day emissions plus the previous 29 days.

105. Using data provided by PPG on a U.S. EPA Method 204 Permanent Total Enclosure Verification Form dated March 8, 2006, EPA calculated the equivalent diameters (ED) of the natural draft openings (NDO) according to the formula at C.2.(b)(2)f.i. of the Current Teslin Permit. EPA's calculations show that the distance between the Rear NDO, Front

NDO, Dilution Air Vent, and the exhaust point for PPG's primary process enclosure is less than the distance required to meet the conditions of a primary process enclosure with 100% capture efficiency in violation of the requirements for Teslin Line 3 and Line 4 (P114 and P115) at C.2.(b)(2)e. and C.2.(b)(2)f. of the Current Teslin Permit.

106. Using data provided by PPG on a U.S. EPA Method 204 Permanent Total Enclosure Verification Form dated March 8, 2006, EPA calculated the ED of the NDOs according to the formula at C.2.(b)(2)f.i. of the Current Teslin Permit. EPA's calculations show that the distance between the Rear NDO, Front NDO, Dilution Air Vent, and the exhaust point for PPG's primary process enclosure is less than the distance required to meet the conditions of a primary process enclosure with 100% capture efficiency in violation of the requirements for Teslin Line 3 (P114) at Part-III.A.II.2.a. of the 2005 Teslin Permit.

107. On every day from May 23, 2012 to October 31, 2012, PPG calculated daily emissions for compliance with the emission limitation of 0.8 pounds per hour and 3.5 tons per year for Teslin Line 2 (P110) using only the emission factor generated during the stack test for Lines 2 and 3 performed on June 23, 2010. This emission factor does not reflect the actual stack emissions from the facility when all three lines are operating and is in violation of the testing requirement to calculate daily point source emissions from the combined operations of Line 2, Line 3 and Line 4 at C.1(f)(1)a.i. of the Current Teslin Permit.

108. On every day from May 23, 2012 to October 31, 2012, PPG calculated daily emissions for compliance with the emission limitation of 90% reduction of OC for Teslin Line 2 (P110) using only the emission factor generated during the test for Lines 2 and 3 performed on June 23, 2010. This emission factor does not reflect the actual stack emissions from the facility when all three lines are operating and is in violation of the testing requirement to calculate daily point source emissions from the combined operations of Line 2, Line 3 and Line 4 at C.1(f)(1)b.i. of the Current Teslin Permit.

109. On every day from May 23, 2012 to October 31, 2012, PPG calculated daily emissions for compliance with the emission limitation of 191 pounds per day and 33.8 tons per year of fugitive OC emissions for Teslin Line 2 (P110) using only the emission factor generated during the test for Lines 2 and 3 performed on June 23, 2010. This emission factor does not reflect the actual stack emissions from the facility when all three lines are operating and is in violation of the testing requirement to calculate daily point source emissions from the combined operations of Line 2, Line 3 and Line 4 at C.1(f)(1)c.i. of the Current Teslin Permit.

110. On every day from May 23, 2012 to October 31, 2012, PPG calculated daily emissions for compliance with the emission limitation of 9.0 pounds per hour of TCE/OC for Teslin Line 3 and Line 4 (P114 and P115) using only the emission factor generated during the test for Lines 2 and 3 performed on June 23, 2010. This emission factor does not reflect the actual stack emissions from the facility when all three lines are operating and is in violation of the testing requirement to calculate daily point source emissions from the combined operations of Line 2, Line 3 and Line 4 at C.2(f)(1)d.i. of the Current Teslin Permit.

111. On every day from May 23, 2012 to October 31, 2012, PPG calculated daily emissions for compliance with the emission limitation of 39.4 tons per year of TCE/OC for Teslin Line 3 and Line 4 (P114 and P115) using only the emission factor generated during the test for Lines 2 and 3 performed on June 23, 2010. This emission factor does not reflect the actual stack emissions from the facility when all three lines are operating and is in violation of the testing requirement to calculate daily point source emissions from the combined operations of Line 2, Line 3 and Line 4 at C.2(f)(1)e.i. of the Current Teslin Permit.

112. On every day from May 23, 2012 to October 31, 2012, PPG calculated daily emissions for compliance with the emission limitation of 90% reduction of TCE for Teslin Line 3 and Line 4 (P114 and P115) using only the emission factor generated during the test for Lines 2 and 3 performed on June 23, 2010. This emission factor does not reflect the actual stack emissions from the facility when all three lines are operating and is in violation of the testing requirement to calculate daily point source emissions from the combined operations of Line 2, Line 3 and Line 4 at C.2(f)(1)f.i. of the Current Teslin Permit.

113. On every day from June 23, 2010 to May 22, 2012, PPG calculated daily emissions for compliance with the emission limitation of 90% reduction of TCE for Teslin Line 4 (P115) using only the emission factor generated during the test for Lines 2 and 3 performed on June 23, 2010. This emission factor does not reflect the actual stack emissions from the facility when all three lines are operating and is in violation of the testing requirement to calculate daily point source emissions from the combined operations of Line 2, Line 3 and Line 4 at Part-III.A.V.1.c.i. of the 2007 Teslin PTI.

114. On every day from June 23, 2010 to May 22, 2012, PPG calculated daily emissions for compliance with the emission limitation of 39.4 tons per year of TCE/OC for Teslin Line 4 (P115) using only the emission factor generated during the test for Lines 2 and 3 performed on June 23, 2010. This emission factor does not reflect the actual stack emissions from the facility when all three lines are operating and is in violation of the testing requirement to calculate daily point source emissions from the combined operations of Line 2, Line 3 and Line 4 at Part-III.A.V.1.e.i. of the 2007 Teslin PTI.

115. On every day from June 23, 2010 to May 22, 2012, PPG calculated daily emissions for compliance with the emission limitation of 9.0 pounds per hour TCE/OC for Teslin Line 4 (P115) using only the emission factor generated during the test for Lines 2 and 3 performed on June 23, 2010. This emission factor does not reflect the actual stack emissions from the facility when all three lines are operating and is in violation of the testing requirement to calculate daily point source emissions from the combined operations of Line 2, Line 3 and Line 4 at Part-III.A.V.1.f.i. of the 2007 Teslin PTI.

116. PPG began operating Teslin Line 4 on June 1, 2009, and performed the first compliance test on December 2, 2009 over six months after beginning operations. This is a violation of the testing requirement to conduct emission testing within three months after the startup of Teslin Line 4 (P115) at III.A.V.2.a. of the 2007 Teslin PTI.

117. PPG failed to perform monthly monitoring for pumps "in light liquid service" for the month of December 2012, in violation of requirements for the leak detection and repair (LDAR) program for Teslin Line 3 and Line 4 (P114 and P115) at C.2.(d)(5)(a) of the Current Teslin Permit.

118. PPG failed to perform weekly inspections of pumps "in light liquid service" for the weeks of July 22, 2012 and November 7, 2012, in violation of requirements for the LDAR program for Teslin Line 3 and Line 4 (P114 and P115) at C.2.(d)(13) of the Current Teslin Permit.

119. In the annual compliance certifications submitted to EPA for the years 2010 and 2011, PPG failed to identify the above listed instances of noncompliance with permit requirements in violation of the compliance certification requirements at I.A.12.d. of the 2005 Teslin Permit.

South Plant

120. The performance test performed by PPG on October 25, 27, and 28, 2004 did not determine the destruction efficiency of the incinerator.

121. Based on discrepancies of the stated airflow at the inlet and outlet of the incinerator, the performance test performed by PPG on February 15, 2005, did not consist of three valid runs as required by the Ohio SIP at OAC 3745-21-10(C)(3)(g).

122. By not performing a valid performance test during testing in 2004 and 2005, PPG could not collect and record temperature data from the incinerator for periods when the average temperature was more than 50 degrees Fahrenheit below the average temperature during the most recent emission test that demonstrated the emission unit was in compliance. This is a violation of the monitoring and recordkeeping requirements for the Chloroformate Plant (P098) at Part III.A.III.2.a. of the 2005 South Plant Permit from at least July 1, 2008 to October 27, 2010.

123. During the performance test conducted by PPG on October 27, 2010, PPG did not operate at or near maximum operating capacity. This is a violation of the Ohio SIP at OAC 3745-21-10(C)(3)(a).

124. During the performance test conducted by PPG on October 27, 2010, PPG failed to perform three valid test runs. This is a violation of the Ohio SIP at OAC 3745-21-10(C)(3)(g).

125. By not conducting a valid performance test on October 27, 2010, PPG violated the testing requirements for the Chloroformate Plant (P098) to conduct emission testing approximately 2.5 years after permit issuance and within 6 months of permit expiration at Part III.A.V.2.a. of the 2005 South Plant Permit.

126. By not performing a valid performance test during testing in 2010, PPG could not collect and record temperature data from the incinerator for periods when the average temperature was more than 50 degrees Fahrenheit below the average temperature during

the most recent emission test that demonstrated the emission unit was in compliance. This is a violation of the monitoring and recordkeeping requirements for the Chloroformate Plant (P098) at Part III.A.III.2.a. of the 2005 South Plant Permit from October 28, 2010 to September 7, 2012.

Environmental Impact of Violations

127. These violations have caused or can cause excess emissions of volatile organic compounds, which contribute to ground level ozone. Ground level ozone irritates the human respiratory system and reduces lung function.

7/10/13
Date

George T. Czerniak
Director
Air and Radiation Division

CERTIFICATE OF MAILING

I, Loretta Shaffer, certify that I sent a Notice of Violation, No. EPA-5-13-OH-07, by Certified Mail, Return Receipt Requested, to:

Jerry Osheka
PPG Industries, Inc.
Monroeville Chemical Center
440 College Park Drive
Monroeville, PA 15146

I also certify that I sent copies of the Notice of Violation by first-class mail to:

Robert Hodanbosi
Chief, Division of Air Pollution Control
Ohio Environmental Protection Agency
50 West Town Street, Suite 700,
Columbus, OH 43215

Sam Rubens, Air Administrator
Akron Regional Air Quality Management District
146 South High St. Room 904
Akron, OH 44308

On the 15 day of July 2013.

Loretta Shaffer

AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7670 1891